

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHARON PIZZARO, individually and on behalf
all others similarly situated,

Plaintiff,

v.

SAZERAC COMPANY, INC.,

Defendant.

Case No. 7:23-cv-02751-KMK

CINDY KOONCE, individually and on behalf of
all others similarly situated,

Case No. 7:23-cv-04323-UA

Plaintiff,

v.

SAZERAC COMPANY, INC.,

Defendant.

MOTION FOR CONSOLIDATION

Plaintiffs Sharon Pizzaro, and Cindy Koonce (“Plaintiffs”), through their undersigned attorneys, hereby respectfully move this Court for entry of an Order consolidating the above-captioned related actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and granting such other relief as the Court may deem appropriate. In support of this motion, Movants rely on the accompanying memorandum of law.

Dated: June 7, 2023

Respectfully submitted,

By: /s/ Charles D. Moore
Charles D. Moore

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**Pro Hac Vice Application Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Charles D. Moore
Charles D. Moore